SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

CASE NO. 287

CIVIL ACTION

This Document Relates to All Actions

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

CASE NO. 287

CIVIL ACTION

JUL 2 2 2010

BRIAN R. MARTINOTTI, J.S.C.

#### CASE MANAGEMENT ORDER NO. 7

#### **PLAINTIFF FACT SHEET**

This matter, having been opened to the Court by counsel for the Parties, and the Parties having consented, stipulated and agreed to the entry of this Case Management Order, and good cause appearing therefore;

IT IS, on this  $\frac{22}{\text{day of }}$  day of  $\frac{\text{July}}{\text{day of }}$ , 2010, hereby **ORDERED** as follows:

### A. Plaintiff Fact Sheet, Authorizations and Responsive Documents.

- 1. The parties<sup>1</sup> have agreed upon a Plaintiff Fact Sheet ("PFS") that includes document requests in Section XII and a variety of Authorizations. *See* Exhibit 1. Each Plaintiff shall produce to Defendants a completed PFS, executed Authorizations and documents responsive to Section XII of the PFS ("Responsive Documents") pursuant to the terms of this Order.
- 2. A completed PFS, which requires that each Plaintiff sign the Declaration in Section XIII, shall be considered to be interrogatory answers and responses to requests for production under the Rules Governing the Court of the State of New Jersey, and will be governed by the standards applicable to written discovery under the Rules Governing the Court

<sup>&</sup>lt;sup>1</sup> In the event that any future case alleging injury from ingestion of Gianvi is determined to be appropriate for inclusion in this coordinated proceeding, this Case Management Order will apply to the Pharmaceutical Company Defendants named and properly served in that case.

of the State of New Jersey. Accordingly, Defendants' use of the PFS is in lieu of interrogatories and other discovery devices that they would otherwise have propounded. As set forth below in Section C, each PFS that is completed must be substantially complete. The PFS questions and requests for production have been negotiated and agreed to by the parties. All objections to the admissibility of information contained in the PFS are reserved and therefore no objections shall be lodged in the response to the questions and requests contained in the PFS.

- 3. Nothing in this section prohibits a Plaintiff from withholding or redacting information based upon a recognized privilege. If information is withheld or redacted on the basis of privilege, Plaintiff shall provide Defendants with a privilege log. In the event that a dispute arises concerning the completeness or adequacy of a Plaintiff's response to any request contained in the PFS, this section shall not prohibit the Plaintiff from asserting that his or her response is adequate.
- 4. Nothing in the PFS shall be deemed to limit the scope of inquiry at depositions and admissibility of evidence at trial. The scope of inquiry at depositions shall remain governed by the Rules Governing the Court of the State of New Jersey. The admissibility of information in responses to the PFS shall be governed by the Rules Governing the Court of the State of New Jersey and no objections are waived by virtue of any PFS response.

#### B. Schedule of Production of PFSs.

1. Each Plaintiff whose case is docketed in this mass tort proceeding as of the date of entry of this Order shall have 45 days from the date of this Order to produce to Defendants a completed PFS, executed Authorizations and Responsive Documents. Each Plaintiff whose case is docketed in this mass tort proceeding after the date of entry of this Order shall have 45 days

from the date that service of her Complaint is made on the first Defendant to produce to Defendants a completed PFS, executed Authorizations and Responsive Documents.

- 2. Plaintiffs who file a case directly in the Superior Court of Bergen County are hereby on notice that, pursuant to this Order, each Plaintiff has 45 days from the date of service of the first answer to her Complaint to produce to Defendants a completed PFS, executed Authorizations and Responsive Documents.
- 3. Service of the PFS shall be either in hard-copy or in an electronic format on CD via first class mail, addressed to Defendants' Counsel at:

YAZ®/Yasmin®/Ocella® Plaintiff Fact Sheet c/o Jennifer La Mont, Esq. Drinker Biddle & Reath LLP 500 Campus Drive Florham Park, New Jersey 07932-1047

- C. <u>PFSs Must Be Substantially Complete in All Respects.</u> Every Plaintiff is required to provide Defendants' Counsel (as set forth above) with a PFS that is substantially complete in all respects. Substantially complete in all respects requires a Plaintiff to:
- 1. Answer all applicable questions in the PFS (Plaintiff may answer questions in good faith by indicating "not applicable" or "I don't know" or "Unknown");
  - 2. Include a signed Declaration (found at Section XIII of the PFS);
  - 3. Provide duly executed record release Authorizations; and
- 4. Produce the documents requested in the PFS, to the extent such documents are in Plaintiff's possession.

#### D. Authorizations for the Release of Records.

- 1. As set forth above, Authorizations for the Release of Records together with copies of such records, to the extent that those records or copies thereof are in the Plaintiff's possession, shall be provided, completed in full but for the date, along with the PFS at the time that the Plaintiff is required to serve a PFS pursuant to this Order.
- 2. In addition to the addressed Authorizations described above, Plaintiff's counsel shall also maintain in their file unaddressed, executed Authorizations. Plaintiff's counsel shall provide executed Authorizations to Defendants' counsel within 21 days of a request for Authorizations.
- 3. Undated Authorizations constitute permission for Defendants to date (and where applicable, re-date) Authorizations before sending to records custodians. Should Plaintiffs provide Authorizations that are undated, this shall not constitute a deficiency or be deemed a substantially non-complete PFS.
- 4. With respect to Authorizations provided to Defendants that are dated, Defendants and their record copy vendor, Litigation Management, Inc. ("LMI") are hereby authorized to redate the Authorizations to the date that they are being sent to the Healthcare Providers and other entities that require Authorizations, provided that the date affixed is not later than December 31, 2011. Defendants and LMI shall be permitted to "white out" the date and re-date.
- 5. In the event that a signed Authorization does not contain the following information with respect to the Plaintiff or, in the case of an Authorization signed in a representative capacity, the information with respect to the represented party Defendants and LMI are authorized to fill in the following information:

- a. The name and/or address of the Plaintiff, or represented party, at the top of the Authorization;
  - b. The social security number of the Plaintiff or represented party;
  - c. The date of birth of the Plaintiff or represented party;
- d. The name of defense counsel or LMI as the party to whom records may be released.
- 6. With respect to Authorizations signed "in blank" (i.e., without setting forth the identity of the custodian of records or provider of care), Defendants and LMI may address such Authorizations and use such Authorizations to obtain records for only those Healthcare Providers and other sources of records (e.g., pharmacies, employers, etc.) identified in the PFS, subject to the limitations for Educational and Employment Authorizations, as identified in Sections XII.A.3 and XII.A.6 of the PFS. Defendants or LMI shall provide e-mail notice to Plaintiff's counsel when an Authorization is changed consistent with this paragraph three (3) business days prior to sending the Authorization to a provider.
- 7. In the event that an institution or medical provider to whom any Authorization is presented refuses to provide records in response to that Authorization, Defendants shall notify Plaintiff's individual representative counsel. Should a particular form be required, Defendants will provide it to Plaintiff's individual representative counsel. The individual Plaintiff shall execute and return within 21 days whatever form is required by that institution or provider.
- 8. Defendants' record copy service vendor shall have the right to contact institutions or medical providers to follow-up on medical record copying or production.
- **E.** <u>Non-compliance with PFS Requirements.</u> Any Plaintiff who fails to comply with her PFS obligations under this Order may be subject to having her claims, as well as any derivative

claim(s), dismissed. If Defendants have not received a completed PFS from a Plaintiff within 20 days following the due date set forth herein, Defendants will send a Notice of Overdue Discovery to Plaintiff's counsel identifying the discovery overdue and stating that, unless the Plaintiff complies with the Court's discovery orders, the case may be subject to dismissal. If Defendants have not received a completed PFS within 21 days after serving a Plaintiff with a 20-day notice, Defendants may move the Court for an Order dismissing the Complaint without prejudice. Plaintiff shall have 14 days from the date of Defendants' motion to file a response either certifying that the Plaintiff has served upon Defendants and Defendants have received a completed PFS, and attaching appropriate documentation of receipt or an opposition to Defendants' motion. If a Plaintiff files such a notice, the Plaintiff's claims shall not be dismissed. Unless Plaintiff has served Defendants with a completed PFS or has moved to vacate the dismissal without prejudice within 60 days after entry of any such Order of Dismissal without Prejudice, the order will be converted to a Dismissal with Prejudice upon Defendants' motion.

F. <u>Copies of Records.</u> Defendants or their designee(s) shall make available all records obtained by use of Authorizations to the attorney of record for each individual Plaintiff within 30 days of the receipt of the records. The parties shall meet and confer concerning the mechanism for providing copies of medical records and the payment for such copies.

BY THE COURT:

Hon. Brian R. Martinotti, J.S.C.

FP01/6342241.1

IN DE VAZO VACMINO CONVA	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY
IN RE YAZ®, YASMIN®, OCELLA® LITIGATION	<b>CASE NO. 287</b>
This Document Relates to All Actions	CIVIL ACTION

## PLAINTIFF FACT SHEET

Please provide the following information for each individual on whose behalf a claim is being made. If you are completing this Plaintiff Fact Sheet in a representative capacity, please respond to the remaining questions with respect to the person who used Yaz® and/or Yasmin® and/or Ocella®. Whether completing this fact sheet for yourself or for someone else, please assume that "You" means the Yaz® and/or Yasmin® and/or Ocella® user.

In filling out this form, please use the following definitions: (1) "health care provider" means any hospital, clinic, medical center, physician's office, infirmary, medical or diagnostic laboratory, or other facility that provides medical, dietary, psychiatric or psychological care or advice, and any pharmacy, weight loss center, x-ray department, laboratory, physical therapist or physical therapy department, rehabilitation specialist, physician, psychiatrist, osteopath, homeopath, chiropractor, psychologist, nutritionist, dietician, or other persons or entities involved in the evaluation, diagnosis, care and/or treatment of you; (2) "document" means any writing or record of every type that is in your possession, including but not limited to written documents, documents in electronic format, cassettes, videotapes, photographs, charts, computer discs or tapes, and x-rays, drawings, graphs, phone-records, non-identical copies and other data compilations from which information can be obtained and translated, if necessary, by the respondent through electronic devices into reasonably usable form.

You may attach as many sheets of paper as necessary to fully answer these questions.

I.	CASE INFORMATION		
1.	Name of person completing this form:	112	

a.	Case caption:
b.	Docket Number:
c.	Court in which action was originally filed:
d.	Name, address, telephone number, fax number and email address of principal attorney representing you:
	Name:
	Firm:
	Address:
	reiephone Number: Fax Number:
f yo	E-mail Address:
of tl	ou are completing this Plaintiff Fact Sheet in a representative capacity (e.g., on behalf
of th	E-mail Address:  Ou are completing this Plaintiff Fact Sheet in a representative capacity (e.g., on behalf ne estate of a deceased person or a minor), please complete the following:  Your name:
of th	E-mail Address:  ou are completing this Plaintiff Fact Sheet in a representative capacity (e.g., on behalf ne estate of a deceased person or a minor), please complete the following:
of that.	E-mail Address:  Ou are completing this Plaintiff Fact Sheet in a representative capacity (e.g., on behalf ne estate of a deceased person or a minor), please complete the following:  Your name:  Current Address:
of that.	E-mail Address:  Ou are completing this Plaintiff Fact Sheet in a representative capacity (e.g., on behalf the estate of a deceased person or a minor), please complete the following:  Your name:  Current Address:  In what capacity are you representing the individual or estate:
of tha.	E-mail Address:
If yo of the a.	E-mail Address:

# THE REST OF THIS PLAINTIFF FACT SHEET REQUESTS INFORMATION ABOUT THE PERSON WHO USED YAZ® AND/OR YASMIN® AND/OR OCELLA®

Name:	
Maiden or other names used and dates you used	I those names:
Current Address and Date when you began living	
Identify each address at which you have resided dates you resided at each one.	
Address	Dates of Residence
Social Security Number:	
Date and Place of Birth:	
Current Marital Status:	
If married, has your spouse filed a loss of consor	
Yes No	
Occupation of current spouse:	
Name(s) of current and former spouse(s), date(s) were terminated, if applicable, and the nature of	of marriage(s) and dates the marriage(the termination (e.g., death, divorce):

		Child	's Name and Address		Date of	Birth
12.	Idon	tify all ask				
	1000	School	Address and Telephone Number	Dates of attendance	Degree Awarded	Major or Primary Fie
			2 stophone I (umber	attendance	Awarueu	Tilmary Fle
13.	Are	you current	ly employed? Yes	No		
			identify your current emp		on there:	
					1	
	a.	Did you	ever leave this job for a m	edical reason?	Yes	No
		If "Yes"	, describe why you left:			
		VOIL ever s	erved in any branch of the			/
4.	Have	you ever s	erved in any branch of the	military? Yes	ſ	No

		Yes	No		
		If "Yes", s	tate what that condition	on was:	
	b.	Have you e medical, ph	ver been rejected from ysical, or psychiatric of	military service for any condition?	reason relating to you
		Yes	No		
		If "Yes", s	tate what that conditio	n was:	
	begi	nning ten (10)	years prior to using Y	m you had health insurar az® and/or Yasmin® and	d/or Ocella® (or the a
	of 13	3, whichever i ic assistance i	s later) up to the present applicable:	nt, and please include all	private insurance and
Vai		Insurance ipany	Policy Number	Name of Policy Holder/Insured (if	Approx. Dates of Coverage
				different than you)	
				different than you)	
				different than you)	
				different than you)	
				different than you)	
	Have	e you applied t	for workers' compensa past ten (10) years?	ation, social security, or s	state or federal disabil
	bene	fits within the	for workers' compensa past ten (10) years?		state or federal disabil
	bene	fits within the	past ten (10) years?	ation, social security, or s	state or federal disabil
	bene	If "Yes", th	past ten (l0) years?  No  en as to each applicati	ation, social security, or s	
	Yes	If "Yes", the	past ten (l0) years?  No  en as to each applicati  ar) of application:	on, separately state:	
	Yes a.	If "Yes", the Date (or year)	past ten (l0) years?  No  en as to each application:  nefits:	ation, social security, or social security, or social security.	

e.	Amount awarded:
f.	Basis of your claim:
g.	Was claim denied? Yes No
h.	To what agency or company did you submit your application:
i.	Claim/docket number, if applicable:
Have	you ever been denied life insurance for reasons relating to your health?
Yes_	No I don't know
	If "Yes", please state when the denial occurred, the name of the life insurance company, and the company's reason for denial:
	you ever filed a lawsuit other than the present suit, relating to any bodily injury in the past ten (10) years?
withir	
withir	n the past ten (10) years? No
within	If "Yes", please explain the nature of the case, where it was filed, and identify
Yes In the you be	If "Yes", please explain the nature of the case, where it was filed, and identify
Yes In the you be dishort	If "Yes", please explain the nature of the case, where it was filed, and identify your lawyer:  last 10 years, have you been convicted of or pled guilty to any felony and/or have een convicted of or pled guilty to any crime that involved an alleged act of

## III. HEALTH CARE PROVIDERS AND PHARMACIES

1. Identify each doctor or other health care provider who you have seen for medical care and treatment in the past ten (10) years:

Doctor or Health care Provider's Name	Doctor or Health care Provider's Specialty	Address	Reason for Visit	Approx. Dates/Years of Visits

2. Identify each hospital, clinic, or health care facility where you were hospitalized (inpatient, out-patient, or emergency room visit) in the past ten (10) years:

Name	Address and Telephone Number	Admission Date(s)	Reason for Admission Approx dates/years of visits
я	X		

3. Identify each pharmacy that has dispensed medication to you in the past ten (10) years:

Name of Pharmacy	Address and Telephone Number of Pharmacy	Name of medication dispensed	Approx. Dates/Years You Used Pharmacy

V.	MEDICAL BA	CKGROUND		
	Current Height:			
	Current Weight			
	Approximate we	eight immediately before	re using Yaz® and/or	Yasmin® and/or
	Approximate we	eight at the time of your	r injury:	
		te and age of your first		
	applicable to you chewing tobacco	ir history of tobacco us	ent ('heck the angwar	your use of Yaz® and/or and fill in the blanks s, cigars, pipes, and/or
	I used tob Yasmin®	acco in three year perio and/or Ocella®	od prior to my use of	Yaz® and/or
	Ty	rpe(s) of tobacco used (uff)	cigarettes, cigars, pip	es, smokeless tobacco,
	Ap	pproximate Date tobacc	o use started:	
	Aŗ	proximate Amount use	ed:	*
	I currently	use tobacco		
	Type(s) of snuff)	tobacco used (cigarette		
	Approxima	ate Date tobacco use sta		
		ate Amount currently u		

Ale	cohol Consumption: For the one (1) year period prior to your use of Yaz® and/osmin® and/or Ocella® up to the present, did you drink alcohol (beer, wine, etc.)?
	Yes No
repi	If "Yes", fill in the appropriate blank with the number of drinks that best resents your approximate average alcohol consumption during that time:
	drinks per week, or
	drinks per month; or
	drinks per year; or
	Other (describe):
1 asi	<b>feine Consumption</b> : For the one (1) year period prior to your use of Yaz® and/o min® and/or Ocella® up to the present, did you consume caffeinated beverages (ee, tea, soda):
coffe	feine Consumption: For the one (1) year period prior to your use of Yaz® and/o min® and/or Ocella® up to the present, did you consume caffeinated beverages (ee, tea, soda):  Yes No
coffe (a)	<b>feine Consumption</b> : For the one (1) year period prior to your use of Yaz® and/o min® and/or Ocella® up to the present, did you consume caffeinated beverages (ee, tea, soda):
coffe (a)	feine Consumption: For the one (1) year period prior to your use of Yaz® and/o min® and/or Ocella® up to the present, did you consume caffeinated beverages (ee, tea, soda):  Yes No  If "Yes", fill in the appropriate blank with the number of drinks that best
coffe (a)	feine Consumption: For the one (1) year period prior to your use of Yaz® and/o min® and/or Ocella® up to the present, did you consume caffeinated beverages (ee, tea, soda):  Yes No  If "Yes", fill in the appropriate blank with the number of drinks that best esents your approximate average caffeine consumption during that time:
coffe (a)	feine Consumption: For the one (1) year period prior to your use of Yaz® and/omin® and/or Ocella® up to the present, did you consume caffeinated beverages (e.e., tea, soda):  Yes No  If "Yes", fill in the appropriate blank with the number of drinks that best esents your approximate average caffeine consumption during that time: drinks per week, or
coffe (a)	feine Consumption: For the one (1) year period prior to your use of Yaz® and/omin® and/or Ocella® up to the present, did you consume caffeinated beverages (e.e., tea, soda):  Yes No  If "Yes", fill in the appropriate blank with the number of drinks that best esents your approximate average caffeine consumption during that time: drinks per week, or drinks per month; or

9.	State whether in the 30 day period prior to the o sought in this action, you engaged in any prolon such as sitting in an airplane or a long car trip, a provide a description of such prolonged travel, i	nged travel (and set forth	meaning six h the date of su	ours or longer) ch travel, and				
10.	Have you ever been diagnosed with or sought tr conditions? Please select "Yes", "No" or "Unkn							
	(a) For each condition for which you answe information requested in subpart (b):	r "Yes", ple	ase provide th	e additional				
Cor	ndition	Yes	No	Unknown				
1.	Abnormal genital bleeding							
2	Abnormality of blood vessels or circulatory system							

Condition		Yes	No	Unknown
1.	Abnormal genital bleeding			
2.	Abnormality of blood vessels or circulatory system			
3.	Acne (within one year of use of Yaz®/Yasmin®/Ocella®)			
4.	Adrenal insufficiency			
5.	Alcoholism			
6.	Allergy, such as hay fever, asthma, eczema, hives, sensitivity to drugs and other substances			
7.	An abnormal physical condition symptomatic of any disease such as edema of the extremities, pain in the extremities, prolonged (longer than 1 week) subnormal or elevated temperature, recurring headaches, jaundice			
8.	Aneurysm			
9.	Angina or chest pain			
10.	Anorexia or bulimia			
11.	Any blood clotting disorder			
12.	Arteriovenous malformation (AVM)			
13.	Autoimmune disease or condition such as lupus, rheumatoid arthritis, psoriasis, scleroderma, or mixed-connective tissue disorder			
14.	Bleeding disorder			
15.	Blood clots or thrombosis		1	

Condition		Yes	No	Unknown
16.	Blood disorder or dyscrasia			
17.	Brain tumors			
18.	Cancer - Breast			
19.	Cancer - Cervical			
20.	Cancer - Endometrial			
21.	Cancer - Other form of Cancer			
22.	Cerebrovascular disease or condition			
23.	Coronary artery disease or other heart disease			
24.	Cystitis			
25.	Deep Vein Thrombosis (DVT)			
26.	Diabetes	114	7	
27.	Ectopic Pregnancy			
28.	Elevated Cholesterol			
29.	Gastrointestinal disease such as gallbladder disease, colitis, intestinal obstruction, liver dysfunction			
30.	Glandular disease, such as malfunction of the pancreas, parathyroid, thyroid, adrenal, or pituitary			
31.	Gout			
32.	Heart attack			
33.	Heart valve disease or abnormality			
34.	Hepatic dysfunction or active liver disease			
35.	Hypercoagulable conditions ( <i>e.g.</i> , conditions, whether genetic or acquired, in which your blood clots too much)			
36.	Hypertension or high blood pressure			
37.	Hypotension			
38.	Increased C-reactive protein (CRP) levels			
39.	Infectious disease, such as tuberculosis, pneumonia, rheumatic fever, syphilis, gonorrhea, typhoid fever, encephalitis, poliomyelitis, malaria or hepatitis			
40.	Irregular heart beat, atrial fibrillation, arrhythmia, heart palpitations, tachycardia (rapid heart beat), bradycardia (slow heart beat)			
41.	Jaundice			

Con	dition	Yes	No	Unknown
42.	Kidney disease or impaired kidney function			
43.	Liver tumor			
44.	Migraine or other headaches with neurological symptoms			
45.	Mitral valve prolapse			
46.	Neurological disease or condition (such as Parkinson's disease, paralysis)			
47.	Ovarian cysts			
48.	Peripheral vascular disease			
49.	Portal Vein Thrombosis			27
50.	Premenstrual dysphoric disorder (or "PMDD")			
51.	Premenstrual syndrome (or "PMS")			
53.	Pulmonary Embolism (PE)			
54.	Retinal bleed			
55.	Rheumatological condition			
56.	Seizure disorder or epilepsy			
57.	Shortness of breath			
58.	Stroke or brain hemorrhage (any type)		7	
59.	Transient Ischemic Attack (TIA)			
60.	Varicose veins			
61.	Vasculitis	Land Land	1.00	

(b) For each condition for which you answered "Yes" in the previous chart, please provide the information requested below (and attach additional pages as necessary):

Condition	Approximate Date of Onset	Name, Address and Telephone Number of Treating Health Care Provider or Health Care Facility

# V. <u>ADDITIONAL MEDICATIONS</u>

1. Do you currently take, or have you ever taken in the last ten (10) years, any of the following medications (generic name is followed brand name products in [brackets]):

Name of Medication		Yes	No	Not sure/ Unknown/ Do Not Recall
1.	ACE inhibitors (e.g., captopril [Capoten], enalapril maleate [Vasotec], lisinopril [Zestril] benazepril [Lotensin], fosinopril [Monopril], moexipril [Univasc], perindopril [Aceon], quinapril [Accupril], ramipril [Altace], trandolapril [Mavik])			
2.	Aldosterone antagonists (e.g., spironolactone [Aldactone], eplerenone [Inspra])			
3.	Angiotensin-II receptor antagonists (e.g., losartan [Cozaar], valsartan [Diovan], irbesartan [Avapro], candesartan [Atacand], eprosartan [Teveten], olmesartan [Benicar], telmisartan [Micardis])			
4.	Antibiotics (e.g., ampicillin, tetracycline, griseofulvin)			
5.	Anticoagulants (e.g., Coumadin, Warfarin, Fragmin, Lovenox, or Heparin)			
6.	Anticonvulsants (e.g., Phenobarbital, phenytoin [Dilantin], carbamazepine [Tegetrol])			
7.	Any medications for migraine headaches			
8.	Ascorbic acid [Vitamin C]	<i>a</i> .		
9.	Asthma/breathing medications	P		
10.	Atorvastatin [Lipitor]			
11.	Blood pressure medications			

	Name of Medication	Yes	No	Not sure/ Unknown/ Do Not Recall
12.	Diuretics			
13.	Heart medications (excluding aspirin)			
14.	Minocycline (e.g.,[Myrac, Dynacin])			
15.	NSAIDs ( <i>e.g.</i> , ibuprofen [Motrin, Advil], naproxen [Naprosyn, Aleve])			
16.	Phenylbutazone			
17.	Potassium supplement			
18.	Potassium-sparing diuretics (e.g., amiloride [Midamor], triamterene [Dyrenium])			
19.	Rifampin [Rifadin]			
20.	St. John's Wort (hypericum perforatum)			
21.				

(a) If you indicated "Yes" for any of the above medications/drugs, please provide the information requested below (and attach additional pages as necessary):

Name of Medication/Drug Used	Dates of Use (approx.)	Name, Address and Telephone Number of prescribing Health Care Provider or Health Care Facility

Name of Prescription Medication Used on a Regular Basis	The health care provider(s) that Prescribed the Medication	dates/years			
	-		× 1		
			1 1 2		
please identify w	pefore the onset of the whether you have taken	/ingested any of	the follow	wing:	
3. For the 20 days by please identify we Name of Medication/I	hether you have taker	injuries for which/ingested any of	the follow	ry is sou wing:	ght in this action  Do Not Reca
please identify w	hether you have taker	/ingested any of	the follow	wing:	
please identify w  Name of Medication/I	Phether you have taker  Drug/Supplement	/ingested any of	the follow	wing:	
Name of Medication/I  1. Ephedra	Phether you have taker  Drug/Supplement  nedications	/ingested any of	the follow	wing:	
Name of Medication/I  1. Ephedra  2. Prescription diet m	Drug/Supplement  nedications aine	/ingested any of	the follow	wing:	

CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER Page 15

Are there any prescription medications that you have taken on a regular basis in the past

If "Yes", please for each prescription medication provide the following

ten (10) years?

(a)

Yes\_\_\_\_\_No\_\_\_\_

information:

Name of Medication/Drug/Supplement	Yes	No	Do Not Recall
6. Marijuana or hashish			
7. LSD, ecstasy, ICE, PCP, MDMA			
8. Amphetamines			
9. Inhaled non-prescriptive substances (e.g., glue or toluene)			
10. Caffeine pills containing stimulants (e.g., No-Doz, Vivarin)			
11. Over the counter appetite suppressants			
12. Dietary supplements			
13. Herbal products			
14. Steroids			

(a) If you indicated "Yes" for any of the above medications/drugs, please provide the information requested below (and attach additional pages as necessary):

Name of Medication/Drug/Supplement	Approximate Date used (that is within 20 days of your alleged Yaz® and/or Yasmin® and/or Ocella® related injury)

4. Except for the medications/drugs/supplements identified in question 3 above, for the twenty (20) day period before the onset of the injuries for which recovery is sought in this action, set forth: (a) the name of each and every over the counter and prescription drug product ingested or otherwise used by you (including all vitamins, nutritional supplements, and all herbal and homeopathic medications and remedies); (b) the date of each ingestion or use; (c) the dosage ingested and frequency of use; (d) the purpose for using each such product; (e) the prescribing physician, if any; (f) the pharmacy or store where the product was purchased; and (g) the date of purchase. Attach additional sheets as necessary.

Name of over-the- counter or prescription drug:	Date(s) of ingestion or use:	Dosage ingested or used and frequency:	Purpose of use:	Prescribing health care provider (if any):	Pharmacy or store where purchased:	Date of purchase:
					ie i	
	1					
	V. 22					
	-					
	1 .					

# VI. PREGNANCY HISTORY

1.	Have	you ever been pregnant? Yes No
	a.	If "Yes", state your total number of pregnancies:
	b.	If "Yes", state your total number of live births:

	60 14	Vos	No	Unlimourn	If "Ves" state
c.	believe you exp			-	e diagnosed with or

Name of Condition	Yes	No	Unknown	If "Yes", state approx. date(s)
Toxemia				
Gestational Diabetes				
Pre-eclampsia				
Miscarriages				

# VII. FAMILY MEDICAL HISTORY

1. Please indicate, to the best of your knowledge, whether your parents, sibling, or grandparents have ever suffered from any of the following:

Cor	dition	Yes	No	I Don't Know
1.	Abnormality of blood vessels	120		
2.	Aneurysm			
3.	Angina or chest pain			
4.	Arteriovenous malformation			
5.	Autoimmune disease or condition ( <i>e.g.</i> , lupus, rheumatoid arthritis, psoriasis, scleroderma, or mixed connective tissue disorder)			
6.	Bleeding disorder			
7.	Blood clots or thrombosis or any other blood clotting disorder			
8.	Blood disorders or dyscrasias (abnormal blood cells)			
9.	Brain Tumors			
10.	Cancer			
11.	Cerebrovascular disease or condition			
12.	Deep vein thrombosis (DVT)			
13.	Diabetes			
14.	Elevated Cholesterol			
15.	Glandular disease (such as malfunction of the pancreas, parathyroid, thyroid, adrenal or pituitary)			
16.	Heart attack			
17.	Heart disease			
18.	Heart valve disease or abnormality		To Market	
19.	Hypercoagulable conditions			
20.	Hypertension or high blood pressure			
21.	Hypotension			
22.	Increased C-reactive protein (CRP) levels			
23.	Infectious disease (within the past year, such as tuberculosis, pneumonia, rheumatic fever, typhoid fever, encephalitis, poliomyelitis, malaria, or hepatitis)			

Con	dition	Yes	No	I Don't Know
24.	Irregular heart beat, atrial fibrillation arrhythmia, heart palpitations, tachycardia (rapid heart beat), bradycardia (slow heart beat)			
25.	Migraine			
26.	Mitral valve prolapse			
27.	Neurological disease or condition (such as Parkinson's disease or paralysis)			
28.	Peripheral vascular disease			
29.	Phlebitis			
30.	Portal vein thrombosis			
31.	Pulmonary Embolism (PE)			
32.	Retinal bleed			
33.	Rheumatological condition			
34.	Seizure disorder or epilepsy	4 6		
35.	Stroke of any type or brain hemorrhage			
36.	Transient ischemic attack (TIA)			
37.	Varicose veins			
38.	Vasculitis			

(a) For each condition for which you answered "Yes" in the immediately preceding chart, please provide the information requested below (and attach additional pages as necessary):

Condition	Date of Onset (approx.)	Relationship to You	Treatment and Outcome (If known)	Name and Address of Treating health care provider or health care facility (If known)
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
***************************************				

# VIII. <u>USE OF CONTRACEPTIVES OTHER THAN YAZ® AND/OR YASMIN®</u> <u>AND/OR OCELLA®</u>

2.	If Yes, what contraceptives have you used in	the past before	re you used	d YAZ® and/o
	Yasmin® and/or Ocella®? Check all that ap	ply below.		
	Form of Contraception	Yes	No	Unknown
(a) O	ral contraceptives (e.g.,. birth control pills)			
(b) N	orplant (e.g.,. implants under skin)			
(c) D	epo-Provera® (the shot)			
(d) N	JuvaRing®			
(e) T	ransdermal contraceptives (e.g., Ortho Evra®)			
(f) In	trauterine device (IUD)			
(g) C	Contraceptive sponge			
(h) D	Diaphragm		9	
(i) C	Condoms			
(j) S	permicide			
(k) R	Rhythm method		1.00	
(l) C	Other			
Form of Appro	of contraception ( <i>i.e.</i> , precise name/type of prox length of use ( <i>i.e.</i> , months/years):	oduct):		
Appro Pharm	of contraception ( <i>i.e.</i> , precise name/type of prox length of use ( <i>i.e.</i> , months/years):nacy where prescription was filled (if applicable care provider who prescribed it:	le):		

Appro	ox length of use	e ( <i>i.e.</i> , months/years):escription was filled (if appli	f product):cable):			
IX.	YAZ® AND/OR YASMIN® AND/OR OCELLA® USE					
1.	Have you ev	er used Yaz®? Yes1	No			
2.	Have you ev	er used Yasmin®? Yes	No			
3.	Have you ev	er used Ocella®? Yes	_ No			
	If "Y	es", identify:				
	a)	Date(s) of use:				
	b)	Provide in the chart below provider(s) who prescribe Ocella® to you:	w the name(s) and address(es) of the health care ed or provided Yaz® and/or Yasmin® and/or			
	Name of he	alth care provider(s)	Address of health care provider(s)			
	c)	pharmacy(ies) or other st	w the name(s) and address(es) of the ore(s) or location(s) from which you obtained nd/or Ocella® (if samples were provided, see no			
Na	me of Pharma	cy or Other Store/Location	Address Address			
-						
		9				

	Do you claim that you or acne?	took Yaz® and/or Yası	min® and/or Ocella® to tre	at PMDD, PMS
	PMDD: Y	es No	_	
	PMS: Y	es No		
	Acne: Y	es No	_	
N	you saw a psychiatrist PMS or the symptoms condition(s) relating t	nsychologist or other i	ne preceding questions, pleamental health care provider ny psychiatric and/or psychlast ten (10) years:  Reason for Treatment	for PMDD,
psyc	e of psychiatrist, hologist or other mental th care provider	Audress and Telephone		Dates/ Years of Treatment Visits
		1 CV 0 1/2	Varmin® and/or Ocalla®	2
5.			Yasmin® and/or Ocella®	?
5.	Yes No	I don't recall	Yasmin® and/or Ocella®	?
5.	Yes No If "Yes", plea	I don't recallase state the following:		
5.	Yes No If "Yes", plea	I don't recallase state the following:	Yasmin® and/or Ocella®	
5.	Yes No If "Yes", plea a) Who gave you the	I don't recall ase state the following: sample(s):		
5.	Yes No If "Yes", plea a) Who gave you the b) When were sample	I don't recall ase state the following: sample(s): es provided:		
5.	Yes No If "Yes", plea a) Who gave you the b) When were sample	I don't recall ase state the following: sample(s): es provided:		

Yes No I don't recall
If "Yes", who gave you the instructions?
L'a recoverage of Vaz® and/or Yasmin® and/
Were you given any oral instructions regarding your use of Yaz® and/or Yasmin® and/Ocella®?
Yes No I don't recall
If "Yes", who gave you the instructions?
Do you have in your possession or does your attorney have the packaging from the Yaz and/or Yasmin® and/or Ocella® you alleged to have used?
YesNo
If "Yes", who currently has custody of the Yaz® and/or Yasmin® and/or Ocella packaging?
Do you know the lot number(s) for any of the Yaz® and/or Yasmin® and/or Ocella® yreceived?
YesNo
If "Yes", what is/are the lot number(s):
Do you know the expiration date for any of the Yaz® and/or Yasmin® and/or Ocella® you received?
YesNo
If "Yes", when is/was/were the expiration date(s):
in a society or television commercials
Have you ever seen any advertisements (e.g., in magazines or television commercials Yaz® and/or Yasmin® and/or Ocella®?

Page 23

communication, (including E-ma including through for an on-line p	oral or written, ail, Text Messag gh websites for 'rogram'?	ys, have you had or do you believe you have had ar with any of the Defendants or their representatives es, E-Minders to/from you and any of the Defendar Yaz® and/or Yazmin® and/or Ocella® and/or signi
Yes	No	I do not recall
the nam	e of the represer	ntative you communicated with, and the substance of you and any representatives of the Defendants:
INJURIES &		a result of taking Yaz® and/or Yasmin® and/or O
Are you claimi	ing any injury as	
Are you claimi Yes	ing any injury as  No  " please describ	
Are you claimi Yes If "Yes as resu	No No s," please describ	be in detail your physical injury(ies) you claim were Yaz® and/or Yasmin® and/or Ocella®:
Are you claimi Yes If "Yes as resu	No No s," please describ	e in detail your physical injury(ies) you claim were
Are you claimi Yes If "Yes as resu	No No s," please describ	oe in detail your physical injury(ies) you claim were Yaz® and/or Yasmin® and/or Ocella®:

ospital admission				
pproximate date(s) of	Approximate date(s) of discharge	Hospital name(s) and address(es):		
Yes No If "Yes", pleas	e provide the following informat	The second secon		
	zed for this/these injury(ies)?			
Name		Address		
treated for the injury(is	e a doctor or health care facility (es), state the name and address of ency medical workers, or ambulancility:	the persons, police department,		
b. Were there any with before your injury occu- his/her/their relationshi	esses when your injury occurred arred, and if so, please state his/hep to you?	or for the period of one (1) hour er/their name(s), address(es) and		

Yes N	lo		
(a) If "Yes", pleat psychiatric and	ase state the following as and/or psychological condi	it pertains to your treatmention(s) in the last ten (10)	nt of any years:
Name of psychiatrist, psychologist or other mental health care provider	Address and Telephone	Reason for Treatment	Approx. Dates/ Years of Treatment/ Visits
		No.	
(a) Have you be problem?	ten dealed in the last ten (	10) years for any cognitive	J.
Yes(b) If "Yes", ple	ease state the following as	s it pertains to your treatments	ent for any
(b) If "Yes", ple		ast ten (10) years:	Approx. Dates/Years Treatment Visits
(b) If "Yes", ple cognitive or	ease state the following as learning problem in the l	ast ten (10) years:  Reason for	Approx. Dates/Years Treatment
(b) If "Yes", ple cognitive or	ease state the following as learning problem in the l	ast ten (10) years:  Reason for	Approx. Dates/Years Treatment

(a)	If "Yes' from yo	", state for the last five our employment:	(5) years the Annua	l gross income y	ou derived
	Year		Ar	nnual gross inco	me
e e					
×					
Nan Add	you are mak gnitive impa re (5) years: ne and ress of ployer	Approx. Dates of Employment	ges (or are claiming blowing for each em  Occupation/Job Title	a stroke, other by ployer you have	Reason f
Nan Add	gnitive impare (5) years:  ne and ress of	Approx. Dates of	Occupation/Job	ployer you have	Reason fo
Nan Add	gnitive impare (5) years:  ne and ress of	Approx. Dates of	Occupation/Job	ployer you have	rain injury, o had in the las  Reason fo  Leaving

Have	you spent any mone	ey as a result of us	ng Yaz® and/or	Yasmin® and/or O	cella®
	Yes No				
(a)	If "Yes", please id incurred:	dentify and itemize	all out-of-pock	et expenses you have	
			=11.25		
	77.				
	V				
		. v			

## XI. FACT WITNESSES

1. Please identify all persons who you believe possess information concerning your injury(ies) and current medical conditions, other than your health care providers, and please state their name, address and his/her/their relationship to you (attach additional pages as necessary):

Name	Address	Relationship to You
	. / / / / / / / / / / / / / / / / / / /	

# XII. DOCUMENT DEMANDS

# A. <u>AUTHORIZATIONS</u>

1) <u>Health care Authorizations</u> – For each health care provider identified in Sections III; IV; V; VII; VIII; IX and X, please provide a completed and signed (but undated) Health care Authorization in the form attached as **Exhibit "A."** 

# 2) Tax Return 4506 and 4506-T IRS Forms –

- a) Only if you answered "Yes" to question X.4 in the PFS and are asserting a claim for lost wages or a reduction in lost earning capacity, please provide a completed and signed IRS Form 4506 and 4506-T attached as **Exhibit "B"** for each year identified in your answer to question X.4.
- b) If you answered "No" to question X.4 in the PFS and are not asserting a wage loss claim or a reduction in lost earning capacity, you are not required to provide IRS Form 4506 / 4506-T.
- asserting a claim for lost wages or a reduction in or lost earning capacity or 2) claiming a stroke, other brain injury, or cognitive impairment, please provide a completed and signed Employment Authorization attached as **Exhibit "C"** for each employer identified in your answer question X.5.
- answered "Yes" to question II.16 in the PFS, stating that you applied for workers' compensation within the past ten (10) years, please provide a completed and signed (but undated) Authorization for Release of Workers' Compensation Records for each agency or company you submitted your application to in the last 10 years in the form attached as **Exhibit "D."**
- "Yes" to question II.16 in the PFS, stating that you applied for disability within the past ten (10) years, please provide a completed and signed (but undated) Authorization for Release for each agency or company you submitted your application to in the last 10 years in the form attached as **Exhibit "E."**
- reduction in or lost earning capacity or 2) claiming a stroke, other brain injury, or cognitive impairment, please provide a completed and signed Educational Authorization attached as **Exhibit "F"** for each educational institution for each educational institution that you listed in response to question II.12.

7)	Insurance Records Authorization- For each company listed in your
response to question	II.15 in the PFS, please provide a completed and signed (but undated)
Authorization for Rele	ease of Insurance Records in the form attached as Exhibit "G".

### B. FEDERAL DISCLOSURES REQUIRED PURSUANT TO 42 U.S.C. § 1395y(b)(7) and (b)(8)

Starting on January 1, 2010, Defendants must report to the federal government certain information about every Plaintiff making a personal injury claim. Please complete the Federal Disclosure statement attached to the end of this Plaintiff Fact Sheet as **Exhibit "H"**.

#### C. OTHER RELEVANT DOCUMENTS

Documents in your possession, including writings on paper or in electronic form (if you have any of the following materials in your custody or possession, please indicate which documents you have and attach a copy of them to this Plaintiff Fact Sheet):

a amac	n u copy of union
1.	All non-privileged documents you reviewed that assisted you in the preparation of the answers to this Plaintiff Fact Sheet. YesNo
2.	A copy of all medical records and/or documents relating to the use of Yaz® and/or Yasmin® and/or Ocella®; from any hospital or health care provider who treated you in the past 10 years and who treated you for any disease, condition or symptom referred to in any of your responses to the questions above and concerning any condition you claim is related to the use of Yaz® and/or Yasmin® and/or Ocella®, including, but not limited to, all imaging studies of any part of your body that relate in any manner to the diagnosis, treatment, care or management of your condition and the injuries alleged in your Complaint. YesNo
3.	If you have been the claimant or subject of any workers' compensation, social security or other disability proceeding, all documents relating to such proceeding. YesNo
4.	All documents constituting, concerning or relating to product use instructions, product warnings, package inserts, pharmacy handouts or other materials distributed with or provided to you in connection with your use of Yaz® and/or Yasmin® and/or Ocella®. Yes No
5.	Copies of advertisements or promotions for Yaz® and/or Yasmin® and/or Ocella® and articles discussing Yaz® and/or Yasmin® and/or Ocella®. YesNo
6.	Copies of the entire packaging, including the box and label for Yaz® and/or Yasmin® and/or Ocella® (plaintiffs or their counsel must maintain the originals of the items requested in this subpart). YesNo

YAZ®, Yasmin® Ocella® Plaintiff Fact Sheet
CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER
Page 31

7.	All documents relating to your purchase of Yaz® and/or Yasmin® and/or Ocella®, including, but not limited to, receipts, prescriptions, prescription records, containers, labels, or records of purchase. YesNo
8.	All documents known to you and in your possession which mention Yaz® and/or Yasmin® and/or Ocella® or any alleged health risks or hazards related to Yaz® and/or Yasmin® and/or Ocella® in your possession at or before the time of the
	injury alleged in your Complaint, other than legal documents, documents provided by your attorney or documents obtained or created for the purpose of seeking legal advice or assistance. YesNo
9.	All documents in your possession or anyone acting on your behalf (not your lawyer) obtained directly or indirectly from any of the Defendants. YesNo
10.	All documents constituting any communications or correspondence between you and any representative of the Defendants. YesNo
11.	All photographs, drawing, journals, slides, videos, DVDs or any other media relating to your alleged injury, and representative photographs of your life after the incident. YesNo
12.	Copies of all documents you (and not your lawyer) obtained from any source related to Yaz® and/or Yasmin® and/or Ocella® or to the alleged effects of using Yaz® and/or Yasmin® and/or Ocella®. YesNo
13.	If you claim you have suffered a loss of earnings or earnings capacity, your federal tax returns for each of the last five (5) years or W-2s for each of the last five years. YesNo
14.	If you claim any loss from medical expenses, copies of all bills from any physician, hospital, pharmacy or other health care providers. YesNo
15.	All public statements made by or on behalf of you relating to this litigation in your possession. YesNo
16.	Copies of letters testamentary or letters of administration relating to your status as plaintiff (if applicable). Yes No
17.	Decedent's death certificate and autopsy report (if applicable). Yes No

#### XIII. <u>DECLARATION</u>

I declare under penalty of perjury that all of the information provided in this Plaintiff Fact Sheet is true and correct to the best of my knowledge, information and belief formed after due diligence and reasonable inquiry, that I have supplied all the documents requested in Part XII of this Plaintiff Fact Sheet, to the extent that such documents are in my possession or in the possession of my lawyers, and that I have supplied the Authorizations attached to this declaration.

Date:	
	Signature

FP01/6337668.1

# EXHIBIT-A

(Healthcare Authorization)

### <u>LIMITED AUTHORIZATION TO DISCLOSE ANI) HEALTH INFORMATION</u> (Pursuant to the Health Insurance Portability and Accountability Act "HIPAA" of 4/14/03)

Patient Name:	
DOB:	
SSN:	
, hereby authorize you to release and furnish to: Sidley A	ustin/Eckert
Seamans/Williams & Connolly/Drinker Biddle & Reath/Litigation Management Inc. <u>COPIES ONLY</u> of following information:	the
* All medical records, including inpatient, outpatient, and emergency room treatment, all clinical charts, reports, correspondence, test results, statements, questionnaires/histories, office and doctor's handwritten notes, and records other physicians. Said medical records shall include all information regarding AIDS and HIV status.  * All reports of autopsy, laboratory, histology, cytology, pathology, radiology, CT Scan, MRI, echocardiogran catheterization reports.	s received by
* All radiology films, mammograms, myelograms, CT scans, photographs, bone scans, pathology/cytology/histology/autopsy/immunohistochemistry specimens, cardiac catheterization videos/CDs/films echocardiogram videos.	
<ul> <li>* All pharmacy/prescription records including NDC numbers and drug information handouts/monogra</li> <li>* All billing records including all statements, itemized bills, and insurance records.</li> </ul>	iphs.
<ol> <li>To my medical provider: this authorization is being forwarded by, or on behalf of, attorneys defendants and has been approved by the Court supervising this litigation. This authorizatio sole purpose of allowing copies of my medical records to be provided to the defendants in the It does not allow discussions of my medical history, care, treatment, diagnosis, prognosis, in revealed by or in the medical records, or any other matter bearing on my medical or physical</li> </ol>	n is for the his litigation.
<ol> <li>I understand that the information in my health record may include information relating to se transmitted disease, acquired immunodeficiency syndrome (AIDS), or human immunodefic (HIV). It may also include information about behavioral or mental health services, and treat alcohol and drug abuse.</li> </ol>	iency virus
3. I understand that I have the right to revoke this authorization at any time. I understand that if I r authorization I must do so in writing and present my written revocation to the health informatio department. I understand the revocation will not apply to information that has already been rele response to this authorization. I understand the revocation will not apply to my insurance complaw provides my insurer with the right to contest a claim under my policy. Unless otherwise revauthorization will expire in one year.	n managemen ased in any when the
4. I understand that authorizing the disclosure of this health information is voluntary. I can refuse authorization. I need not sign his form in order to assure treatment. I understand I may inspect of information to be used or disclosed as provided in CFR 164.524. I understand that any disclosure information carries with it the potential for an unauthorized re-disclosure and the information meaning protected by federal confidentiality rules. If I have questions about disclosure of my health information that releaser indicate above.	re of nay not be
<ol><li>A notarized signature is not required. CFR 164.508. A copy of this authorization may be used i original.</li></ol>	n place of an
Print Name: (plaintiff/representative)	

Date

# EXHIBIT-B

(IRS Forms)

#### Form 4506

(Rev. January 2010)

Department of the Treasury Internal Revenue Service

#### **Request for Copy of Tax Return**

▶ Request may be rejected if the form is incomplete or illegible.

OMB No. 1545-0429

prov	uld be able to provide you a cop rides most of the line entries from	y of the return. The IRS can provide	a Tax Return Transcript for montains the information that a t	return completed by a paid preparer, they hany returns free of charge. The transcrip hird party (such as a mortgage company ratranscript.
1	a Name shown on tax return. If a	olnt return, enter the name shown first		security number on tax return or dentification number (see instructions)
2:	a If a joint return, enter spouse's r	ame shown on tax return.	2b Second so	cial security number if joint tax return
3	Current name, address (including	apt., room, or suite no.), city, state, a	nd ZIP code	
4	Previous address shown on the la	ast return filed if different from line 3		
5	If the tax return is to be mailed to number. The IRS has no control of	a third party (such as a mortgage con over what the third party does with the	npany), enter the third party's na tax return.	me, address, and telephone
Caut	ion. If the tax return is being mailed	d to a third party, ensure that you have see steps helps to protect your privacy	filled in line 6 and line 7 before	signing. Sign and date the form once you
6	Tax return requested. Form schedules, or amended returns	1040, 1120, 941, etc. and all atta s. Copies of Forms 1040, 1040A, and is may be available for a longer per	achments as originally submitted 1040EZ are generally availab	ted to the IRS, including Form(s) W-2, le for 7 years from filling before they are urn number. If you need more than one
		ified for court or administrative procee		
7		er the ending date of the year or period		
	12/31/2002	12/31/2003	12/31/2004	12/31/2005
	12/31/2006	12/31/2007	12/31/2008	
8		return requested. Full payment mus or money order payable to "United our check or money order.		
a	Cost for each return			\$ 57.00
b	Number of returns requested on			
С		e 8b		
9		ve will refund the fee. If the refund sho		
eturn i natters	requested. If the request applies a partner, executor, receiver, as	to a joint return, either husband or	wife must sign. If signed by a than the taxpaver. I certify	or a person authorized to obtain the tax corporate officer, partner, guardian, tax that I have the authority to execute a within 120 days of signature date.  Telephone number of taxpayer on line 1a or 2a
	<b>K</b>		1	
ign	Signature (see instructions)		Date	
lere	Title (if line 1a above is a corpo	ration, partnership, estate, or trust)		
	Spanning of the state of the st			
	Spouse's signature		Date	

#### Form 4506-T

(Rev. January 2010)

Department of the Treasury Internal Revenue Service

#### **Request for Transcript of Tax Return**

▶ Request may be rejected if the form is incomplete or illegible.

OMB No. 1545-1872

		or other return information free of chargur return, use Form 4506, Request for C		
1a	Name shown on tax return. If a joi	nt return, enter the name shown first.		security number on tax return or dentification number (see instructions)
2a	If a joint return, enter spouse's nar	ne shown on tax return.	2b Second so	cial security number if joint tax return
3 (	Current name, address (including a	pt., room, or suite no.), city, state, an	d ZIP code	
4 F	Previous address shown on the las	t return filed if different from line 3		
		s to be mailed to a third party (such as s no control over what the third party		the third party's name, address,
		o a third party, ensure that you have t e steps helps to protect your privacy.	illed in line 6 and line 9 before	signing. Sign and date the form once you
6	Transcript requested. Enter the number per request. ▶		120, etc.) and check the appro	priate box below. Enter only one tax form
	Return Transcript, which include changes made to the account af Form 1065, Form 1120, Form 11:	es most of the line items of a tax re ter the return is processed. Transcrij 20A, Form 1120H, Form 1120L, and prior 3 processing years. Most reque	ots are only available for the f Form 1120S. Return transcrip	ollowing returns: Form 1040 series, its are available for the current year
	assessments, and adjustments ma	ins information on the financial status ide by you or the IRS after the return unt transcripts are available for most n	was filed. Return information is	s limited to items such as tax liability
		ombination of line item information ar ill be processed within 30 calendar d		count. Available for current year and
		s proof from the IRS that you did not ability restrictions on prior year reque		
	these information returns. State or transcript information for up to 10 For example, W-2 information for 2	m 1098 series, or Form 5498 series local information is not included with years. Information for the current year 007, filed in 2008, will not be available ocial Security Administration at 1-800-	h the Form W-2 information. T is generally not available until from the IRS until 2009. If you	the IRS may be able to provide this the year after it is filed with the IRS. need W-2 information for retirement
aution.	. If you need a copy of Form W-2	or Form 1099, you should first contact and request a copy of your return, wh	t the payer. To get a copy of ti	
У	Year or period requested. Enter years or periods, you must attached ach quarter or tax period separate	another Form 4506-T. For request	d, using the mm/dd/yyyy forns relating to quarterly tax retu	nat. If you are requesting more than four urns, such as Form 941, you must enter
_	12/31/2005	12/31/2006	12/31/2007	12/31/2008
formation	on requested. If the request applied partner, executor, receiver, adm	es to a joint return, either husband on ninistrator, trustee, or party other	r wife must sign. If signed by a	or a person authorized to obtain the tax a corporate officer, partner, guardian, tax that I have the authority to execute elived within 120 days of signature date. Telephone number of taxpayer on line 1a or 2a
	Signature (see instructions)		Date	
ign ere	Title (if line 1a above is a corpora	tion partnership estate or trust)		
OI C	, and it and it above is a corpora	more partitionally, coldic, or trusty		
	Spouse's signature	,	Date	

### **EXHIBIT-C**

(Employment Authorizations)

### HIPAA COMPLIANT AUTHORIZATION FORM PURSUANT TO 45 CFR 164.508 EMPLOYMENT AUTHORIZATION

TO:			
	Name of Employer		
	Address, City State and Zip Coo	le	
RE:	Employee Name:	AKA	
	Date of Birth:	Social Security Number:	
	Address:		
and rep suspens rays and to claim question file.	as held; wage and income statement orts; transfers, statements and com- sions, terminations, and all other for d test results; any physical examina as made relating to health, disability	ts and/or compensation records; wage increa- ments of fellow employees; all documents re- rms of discipline; attendance records; W-2s, tion records; all documents relating to my ab- y or accidents in which I was involved includ- to me or on my behalf; and any other records (substance abuse may be disclosed.	records of all positions held; job descriptions of ses and decreases; performance evaluations, reviews lating to discipline including warnings, reprimands, worker's compensation files; all medical records, x-sences, illnesses and injuries; any records pertaining correspondence, reports, claim forms, s relating to my employment and/or in my personnel
	Records Requestor)		
Street A	ddress	City	State and Zip Code
I intend any time	that this authorization shall be cone in the future, either by you or ano	tinuing in nature. If information responsive to ther party, you must produce such information	o this authorization is created, learned or discovered on to the Records Requestor at that time.
already to to which	taken in reliance on this authorization this authorization is directed may	on cannot be reversed, and my revocation wi	enced address. However, I understand that any actio Il not affect those actions. I understand that the entit t or eligibility benefits on whether or not I sign the to release the records herein.
This aut	horization expires December 31,	2011 or at the conclusion of the case, which	thever occurs first.
Signatur	e of Employee or Personal Represe	ntative Date Name of Employee or Personal	Representative
Descripti	on of Personal Representative's A	athority to Sign for Employee (attach docum	ents that show authority)

#### AUTHORIZATION FOR RELEASE OF HEALTH INFORMATION PURSUANT TO HIPAA

Employee is physically unable to provide a signature. I personally witnessed that the Employee understood the nature of his authorization and freely gave her verbal consent to release her medical records.			

# EXHIBIT-D (Workers' Comp. Authorizations)

### AUTHORIZATION FOR RELEASE OF WORKERS' COMPENSATION RECORDS

To:	
	Name
	Address
	City, State and Zip Code
Th	is will authorize you to furnish copies of any and all workers' compensation records of
	cluding, but not limited to, statements, applications, disclosures, correspondence,
	ements, agreements, contracts or other documents, concerning:
,	
	Name of Claimant
1 - 1-6	of birth is and whose social security number is
whose date	of birth is and whose social security number is
You	u are authorized to release the above records to the following representatives of
	a are authorized to release the above records to the renewing representatives of
defendants	in the above-entitled matter, who have agreed to pay reasonable charges made by you
to supply co	opies of such records.
Na	me of Representative
Rec	cords Requester
Kej	presentative Capacity (e.g., attorney, records requestor, agent, etc.)
Str	eet Address
City	y, State and Zip Code
get. :	
	s authorization does not authorize you to disclose anything other than documents and
records to a	nyone,

This authorization shall be considered as continuing in nature and is to be given full force and effect to release information of any of the foregoing learned or determined after the date hereof. It is expressly understood by the undersigned and you are authorized to accept a copy or photocopy of this authorization with the same validity as through the original had been presented to you.

Date:

Claimant Signature
[NAME]

Date:

Witness Signature

### EXHIBIT-E

(Disability Authorizations)

#### AUTHORIZATION FOR RELEASE OF DISABILITY CLAIMS RECORDS

To:		
	Name	
	Address	
	71007055	
	City, State and Zip Code	
	This will authorize you to furnish copies of any and all records of disability	y claims of any
sort, inc	icluding, but not limited to, statements, applications, disclosures, correspond	
	nents, agreements, contracts or other documents, concerning:	
		•
	Name of Claimant	
whose o	date of birth is and whose social security number is	
	You are authorized to release the above records to the following represent	atives of
defenda	ants in the above-entitled matter, who have agreed to pay reasonable charge	es made by you
to suppi	bly copies of such records.	
	Name of Representative	name of the second
	Records Requester  Representative Capacity (e.g., attorney, records requestor, agent, etc.)	
	Representative Capacity (e.g., attorney, records requestor, agent, etc.,	
	Street Address	
	City, State and Zip Code	
	This authorization does not authorize you to disclose anything other than of	locuments and
		iocuments and
records	to anyone.	

This authorization shall be considered as continuing in nature and is to be given full force and effect to release information of any of the foregoing learned or determined after the date hereof. It is expressly understood by the undersigned and you are authorized to accept a copy or photocopy of this authorization with the same validity as through the original had been presented to you.

Date:

Claimant/Guardian/Personal Representative Signature [NAME]

Witness Signature

## EXHIBIT-F

(Educational Authorizations)

#### AUTHORIZATION FOR RELEASE OF EDUCATIONAL RECORDS

To:	
	Name
	Address
	Gity, State and Zip Code
	This will authorize you to furnish copies of all school records including, but not limited
to, tes	st results, test scores, report cards, or other school grading material, attendance records,
	cals and other health-related, including but not limited to any physicians, nursing or allied
	professional reports, records or notes, which may be in your possession.
	Name of Student
whose	e date of birth is and whose social security number is
	You are authorized to release the above records to the following representatives of
defen	dants in the above-entitled matter, who have agreed to pay reasonable charges made by you
to sup	ply copies of such records.
	Name of Representative
	Records Requester Representative Capacity (e.g., attorney, records requestor, agent, etc.)
	Representative Capacity (e.g., attorney, records requestor, agent, etc.)
	Street Address
	Street Address
	C' State A T' Cal
	City, State and Zip Code
	This authorization does not authorize you to disclose anything other than documents and
ecord	s to anyone.
	This authorization is not valid unless the record requestor named above has executed the
ickno	wledgement at the bottom of this authorization.

This authorization shall be	considered as continuing in nature and is to be given full force	
and effect to release information of	any of the foregoing learned or determined after the date	
hereof. It is expressly understood b	by the undersigned and you are authorized to accept a copy or	
photocopy of this authorization with	h the same validity as through the original had been presented	
to you.		
23.10 m.		
Date;	Student [NAME]	
Date:		
	Witness Signature	

# EXHIBIT-G

(Insurance Authorizations)

#### AUTHORIZATION FOR RELEASE OF INSURANCE RECORDS

Address	
City, State	e and Zip Code
This will authorize	e you to furnish copies of all forms regarding insurance claims
	and all medical, health, hospital, physicians, nursing or allied health
	ds, notes or invoices and bills, which may be in your possession.:
	Name of Insured
	Name of Insured
whose date of birth is	and whose social security number is
Mark Till 1960	♥4 -
You are authorize	d to release the above records to the following representatives of
defendants in the above-en	ntitled matter, who have agreed to pay reasonable charges made by you
to supply copies of such re	
Name of Represe	entative
Records Requeste	Γ
Representative C	Capacity (e.g., attorney, records requestor, agent, etc.)
Street Address	
City, State and Z	ip Code
This authorization	does not authorize you to disclose anything other than documents and
records to anyone.	
This authorization	n is not valid unless the record requestor named above has executed the
acknowledgement at the b	oottom of this authorization.

To:

Name of Insurer

This authorization shall be consid	ered as continuing in nature	and is to be given full force
and effect to release information of any of	the foregoing learned or det	termined after the date
hereof. It is expressly understood by the	undersigned and you are auth	norized to accept a copy or
photocopy of this authorization with the s	ame validity as through the o	original had been presented
to you.		
Date:	Insured [NAME]	
Date:	Witness Signature	

# EXHIBIT-H

(Federal Disclosure)

### Federal Disclosure Requirements (required by 42 U.S.C. § 1395y(b)(7) and (b)(8))

Starting on January 1, 2010, defendants must report to the federal government certain information about every plaintiff making a personal injury claim. Please complete the following form.

If you are filling this out in a representative capacity, the information should be for the user of the medication, not yourself.

Full Legal Name:			
Date of Birth:			
Gender:	PAGE - 20-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1		
Social Security Number:	***************************************		
Health Insurance Claim Number (HICN):	war and also and a second and a second as a second		
Are you (or the person taking	g the medication	on) eligible to receiv	e Medicare benefits?
Yes			
No			
If so, on what date did you (or receive Medicare benefits?	or the person to	aking the medication	) become eligible to
	***************************************		